

THE STATE



OF WYOMING

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Mike Sullivan, Governor

Don Diller, P.E., Superintendent and Chief Engineer

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Department of Transportation

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FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY

February 3, 1993

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N. W., Room 222
Washington DC 20005

Re: Opposition to PR Docket No. 92-235

Dear Ms. Searcy:

The Wyoming Transportation Department is sympathetic to the problems of limited radio frequency spectrum, and comprehends the need for creativity in spectrum management by the FCC. The department believes Docket 92-235 neglects significant problems to be incurred by the licensee, when licensee is mandated to narrow band existing systems by 1996 and then to totally discontinued use of aforementioned systems by 2004.

Presently, the Transportation Department has three state-wide VHF systems, which provide communications for the Wyoming Transportation Department, the Wyoming Highway Patrol and other Public Safety users. A fourth VHF system, the State Agency Law Enforcement Communications System (SALECS), is also managed and maintained by the Wyoming Transportation Department. This system provides communications for Wyoming's Game and Fish Department, State Department of Criminal Investigation and various other law enforcement entities throughout the state.

Also in use by the Department are 450 MHz systems for telemetry and alternate communications for remote locations such as mountain pass maintenance camps.

At first review there were some basic problems with Docket 92-235, known as Part-88:

- 1) Part 88 by its very nature will require systems to be completely changed out with no flexibility or opportunity for a structured migration toward the newer or alternate communications technologies. Part 88 does not consider the extreme cost to convert, which becomes an immense issue given this state's economic condition, not to mention the nation's. The cost to our Department to change out all equipment and add possibly 10 new sites, will cost approximately 5 million dollars.

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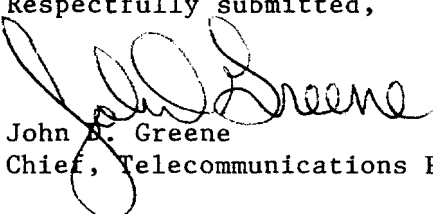
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- 2) Interoperability between new and old system, such as between the new Part 88 VHF 5 kHz equipment and federal 6.25 kHz equipment.
- 3) There are more technical problems in Part 88 than will be addressed in this document, but some are readily apparent.
 - a) Immediate reduction to 3 kHz deviation will result in range reduction of 40%, plus problems in generating sufficient receive audio output power, especially in high noise areas (snow plows, heavy equipment, etc). Additionally, reduced deviation will cause CTCSS decoder failure this means unreliable system performance.
 - b) Reduced transmitter power will result in reduced coverage, which in Wyoming is a primary concern. In many cases, reducing power to the new Part 88 limits will cause serious spurious emissions from power amplifiers.

In this letter we have pointed out but few of the problems for the Public Safety radio system users in Wyoming, which Docket 92-235 does not address. Along with the un-addressed problems, there are other problems appearing daily as we continue to review Part 88 and talk with our counterparts, nation-wide.

After complete review of the docket, the Wyoming Transportation Department finds reason to request the FCC reevaluate its position on Part 88.

Respectfully submitted,


John A. Greene
Chief, Telecommunications Program